



GSA's

# NEPA Call-In Update

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*NEPA Call-In is GSA's National Environmental Policy Act (NEPA)  
information clearinghouse and research service.*

**NEPA Call-In  
is designed to  
meet the NEPA  
compliance needs  
of GSA's realty  
professionals.**

## PBS/AFCEE Partnering Agreement Signed

**O**n April 3, the Public Building Service (PBS) signed a Partnering Agreement with the Air Force Center for Environmental Excellence (AFCEE) that enables the two organizations to share information, contract vehicles, innovative technologies, and technical experts.

The stated purpose of the Partnering Agreement between PBS and AFCEE is to commit the two organizations to

working together toward a vision of excellence in environmental stewardship. Our mutual efforts to share and crossfeed will enable us to reach the common goal of more effective management of our nation's environmental resources. Signing the agreement for PBS was Ms. June V. Huber, Assistant Commissioner for Portfolio Management; and Dr. Constance Ramirez, Director,

Cultural and Environmental Programs, Office of Portfolio Management. Ms. Huber expressed her desire for leadership and coordination at high levels both within GSA and among other Federal agencies. She stated the Partnering Agreement and AFCEE's input is an example of the kind of activity PBS will foster in the future. She

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## Environmental Site Assessments Help Lower Risks

**A**s part of a recent Technical Inquiry (TI), NEPA Call-In was provided with an environmental site assessment (ESA) prepared in 1987. We responded that environmental conditions at the site may have changed significantly in the past 10 years and a more recent ESA would better protect GSA from potential liability. NEPA Call-In was then asked if we could provide further guidance on environmental site assessment, including how old one could be before it was considered "too old" to be of value. The following is an overview of the purpose and limitations of

ESAs, and what guidance NEPA Call-In found on how old is too old.

### What are ESAs?

Since hazardous waste site cleanups can be very expen-

sive and take years to complete, environmental concerns have become an important factor in property acquisition. A Phase I Environmental Site

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*New Partnering Agreement, continued from page 1*

publicly recognized NEPA Call-In, stating she is very happy with the service, and congratulated Colin Wagner, Director, GSA NEPA Program; Colonel Thomas H. Gross, Director, Environmental Conservation and Planning at AFCEE; and Dynamac Corporation for the original development of the program. She was very impressed with the Environmental Quality Advisory Group (EQAG) cooperation, and stated it should be a symbol of what GSA will do in the future. The Partnering Agreement identified the following areas to foster the partnership:

- To disseminate information such as databases, newsletters, fact sheets and relevant studies,
- To utilize existing contract vehicles to expedite and facilitate mutual environmental missions,
- To facilitate the transfer of innovative technologies, ideas, and successes through media such as the World Wide Web and conferences, and
- To provide essential links between the two group's technical experts.

Colonel Gross informed EQAG members about AFCEE activities and programs. AFCEE provides a complete range of environmental, architectural and landscape design, planning and construction management services and products. The in-house staff includes over 400 personnel in technical, scientific, and essential support fields including over 70 contracting experts. AFCEE has nearly \$3 billion of total contract capacity, and provides services in the following areas: Environmental Restoration, Environmental

Conservation and Planning, Pollution Prevention, Environmental Compliance, Construction Management, and a Design Group. The EQAG were interested in the services available through AFCEE, and asked how to access their use. For more information on the Partnering Agreement, contact Colin Wagner, GSA NEPA Program Director, at 202-501-2888. Colonel Gross can be reached at 210-536-3869.



*ESAs Help Lower Risks, continued from page 1*

Assessment (ESA) is an important action the purchaser can make to learn about the property's past use, the environmental conditions at the site and adjoining sites, and the likely presence of hazardous substances. Armed with this knowledge, the prospective purchaser can better assess the financial risk posed by potential environmental contamination, take steps to avoid full or partial liability for cleaning up the property, demand that the current

landowner clean up the property prior to the sale, or have the cost of the property reduced commensurate with the cost of the cleanup activities.

Phase I ESAs involve reviewing records, visiting the site, interviewing owners, occupants and local government officials, and must be conducted by a trained and experienced environmental professional. If the Phase I ESA identifies potential hazardous substances, a Phase II ESA is usually

conducted to confirm the presence or extent of contamination. Phase II ESAs involve collecting and analyzing samples.

If environmental contamination is later discovered on the property, the fact that an ESA was conducted helps the purchaser establish the "innocent landowner" defense under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Under CERCLA, the property owner must establish that at the time of purchasing the property, they

exercised "due diligence" to learn if hazardous substances were disposed of on the property. The ESA should be conducted in accordance with the American Society of Testing and Materials (ASTM) Standard E 1527/1528, Standard Practice for Environmental Site Assessments.

In addition, because a Phase I ESA includes reviews of government files and interviews, adequate lead time is important. Waiting until the last minute can hinder the quality of work performed and thus increase risk.

*Continued on next page*

*ESAs Help Lower Risks, continued from previous page*

## ESAs and NEPA

The purpose of a Phase I ESA is to identify the site's recognized environmental conditions which resulted from past actions. As such, a Phase I ESA does not meet the requirements of the National Environmental Policy Act (NEPA) for Federal agencies to consider the environmental impacts of planned or future actions and decisions. However, Phase II ESAs should be coordinated with NEPA and cultural resources assessment, if they are to be performed.

## How Detailed Should the ESA Be?

For each real estate transaction, the level of inquiry will be different. The term "appropriate inquiry" suggests that the level of inquiry will depend on the circumstances and the underlying facts for each parcel of real estate. So depending on the findings of the ESA, the future owner may be responsible to conduct further research or actually have sampling conducted as part of the ESA to determine if there is contamination. Therefore the appropriate level of inquiry may range from none at all, (in the case of single family residences), to an intrusive Phase II ESA where there is much concern about the likely possibility of contamination.

## How Clean Is Clean?

Assuming the Phase I ESA uncovers contamination, and the seller agrees to clean up the problem, you may think that your problems are solved. Unfortunately, that may not be the case. According to a recent court case reported in the Washington Business Journal, the U.S. Court of Appeals for the Third District recently rejected the purchaser's argument that an agreement for the sale of industrial property required the seller to remediate the property to an extent intended by the purchaser (Sumitomo Machinery Corp. of America Inc. vs. AlliedSignal Inc.). Because the parties' agreement required the seller to clean up the contamination, AlliedSignal had taken the lead in negotiating a cleanup plan with the New Jersey Department of Environmental Protection. Under this plan, Sumitomo would be required to accept specific limitations on the future use of its property in place of more stringent cleanup levels that would have left the site cleaner. Sumitomo opposed this approach arguing that restrictions on the future uses of the property would decrease the property's value, and that the purchase agreement required AlliedSignal to clean up the site to a more stringent level.

The court found that the cleanup language in the sales agreement was ambiguous and AlliedSignal was only required to comply with applicable "requirements" in conducting the cleanup. Since New Jersey did not strictly "require" a more stringent level of cleanup, AlliedSignal only had to satisfy the minimum, less-costly standard acceptable to New Jersey regulators.

## How Recent Must an ESA Be?

NEPA Call-In reviewed GSA's draft NEPA Desk Guide, which states: Phase I studies are presumed valid for 180 days, although older ones may be used depending on the specific circumstances of the property.

Additional guidance can be found in the ASTM standard E 1527-94, which states that a Phase I should be completed less than six months before acquiring the property.

NEPA Call-In also contacted Crestar Bank in Washington, D.C., to determine if commercial banks or developers had developed a commercial policy on how old an ESA could be before it was considered too old. NEPA Call-In contacted Ms. Lisa Rominque in Crestar Bank's Environmental Risk Management Division. Ms. Rominque stated that she was not aware of any com-

monly used commercial practice or standard for the age of an ESA, but noted the guidance listed in the ASTM standard. Ms. Rominque stated that minimizing the risk boils down to the environmental professional's knowledge of the area, the property, and their professional judgment. "On some sites," she said, "six hours can make a difference." For instance, a vacant lot or undeveloped property along a quiet road could be a convenient disposal location for an illegal "midnight dumper." Only a few gallons of used organic solvents or some other hazardous waste are needed to turn a "clean" property into an expensive mess.

NEPA Call-In environmental engineers and geologists have experience designing, conducting, and reviewing Phase I and Phase II ESAs, and more complicated remedial investigations and remedial actions. Contact NEPA Call-In at 202-208-6228 for assistance preparing a SOW for an ESA, designing sampling strategies for Phase II ESAs, or to review and prepare detailed comments on a technical report.



## Approval of NEPA Desk Guide Moves Forward

Since last April's Environmental Quality Advisory Group (EQAG) meeting, the process of "Desk Guide" implementation has not been as rapid as hoped. Tom King's revised categorical exclusions section was substituted for the previous version, and the entire document was edited for style and correct internal cross references. Finally, on June 3rd, the Desk Guide was submitted to the Council on Environmental Quality (CEQ) for review and comment.

Ray Clark, CEQ's Associate Director for NEPA Oversight,

reviewed the Desk Guide and provided verbal comments on July 25th. Mr. Clark declared the document "fabulous" and requested GSA send copies to other Federal agencies as a model for NEPA compliance guidance. Mr. Clark's review was pivotal to finalizing the document. With his blessing of our approach, the documents are being edited to reflect the new National Office realignment and will shortly be circulated for "red border" review. I have always argued that the Desk Guide can be implemented immediately,

independent of the new Order's "redborder process." Therefore, I have informed the EQAG that the draft Desk Guide is now interim guidance for NEPA compliance within GSA. This renders the Order's reborder process a largely *pro forma*, albeit six to twelve month, exercise.

The EQAG will confer by phone in August to discuss use of the Desk Guide and document dissemination. A summary of that conference will be available from NEPA Call-In along with an estimate for implementation of the

revised environmental orders.

Although we are probably six to twelve months away from the NEPA Desk Guide and orders being officially adopted, please be reassured that inevitably it will happen. At that time we can be proud of having moved the agency toward an effective NEPA compliance policy by providing useful compliance guidance.

—Colin Wagner

GSA NEPA Program Director

## GSA Memoranda Are Temporary Documents

*The Policy and Procedural Guidance You May Have Followed May Have No Standing*

As part of a recent TI, NEPA Call-In contacted the GSA Directives and Correspondence Branch, Information Management Division, to determine if a 1990 memorandum was still in force. NEPA Call-In was told that GSA memoranda fall under the Record Symbol "01B002" of

the GSA Records Disposition Schedules, mandated by OAD P 1820.2A, "GSA Records Maintenance and Disposition System." Record Symbol 01B002, "General Administrative Subject files" are temporary documents that are invalid at the end of the fiscal year in which they were issued, and

destroyed after two years. Memoranda should be used to document the basic operations and administration of GSA program offices, and should not include policy or procedures. GSA policy and procedure must always be published as part of the GSA Directives System, as an Order

or Instructional Letter. The Directives and Correspondence Branch can provide assistance in publishing policy as a Directive or Instructional Letter. For more information, contact Ms. Mary Cunningham at 202-501-3415.

## EQAG Members Meet & Approve Draft of NEPA Desk Guide

**N**EPA Program Director Colin Wagner hosted a meeting of the GSA Environmental Quality Advisory Group (EQAG) members April 2-3, 1997, at the GSA National Office in Washington, D.C. Also in attendance from the National Office was Ms. June Huber, Assistant Commissioner for Portfolio Management; Dr. Constance Ramirez, Director, Cultural and Environmental Programs; Dr. Tom King, Advisor, Cultural Resource Compliance; and Col. Thomas Gross, Director, Environmental Conservation and Planning, Air Force Center for Environmental Excellence (AFCEE).

The meeting began with Dr. Ramirez's recognition of the teamwork shown by the EQAG members. "Other GSA

program areas could use the EQAG as an example of how to do business," she stated.

Dr. Ramirez stressed the importance of policy review, training at all levels, and outreach by the Cultural and Environmental Programs Division; and shared the five goals she has set for Cultural and Environmental Programs:

- To provide overall management and policy;
- To provide project goals;
- To provide subject area expertise;
- To support GSA top management by implementing regulations and statutes; and
- To provide funding for contracting services.

The goals of the meeting included reconciliation of

EQAG comments on the draft GSA NEPA Desk Guide and signing of a partnering agreement between GSA and AFCEE (see related story, page 1). Additionally, presentations were given on the successful EIS for the Savannah, Georgia, Courthouse Annex (detailed in the last Update), the NEPA Call-In service and AFCEE.

Dr. King facilitated the review and discussion of the draft NEPA Desk Guide. After all EQAG concerns had been addressed, Mr. Wagner stated the NEPA Desk Guide would be revised and forwarded to the CEQ for approval. He also mentioned there are plans to rework ADM 1020.1, "Procedures for Historic Properties."

The next EQAG meeting is

tentatively scheduled for October 1997 in Denver, Colorado. Dr. Ramirez expressed her desire for the Historic Preservation Officers to meet as the EQAG does, and for the entire group to have a joint meeting in 1998.



### New Environmental Counsel Named

In April, GSA's Office of General Counsel added to its environmental law staff when it named W. James Biederman to handle environmental issues, including NEPA activities. Mr. Biederman came to GSA from the Washington, D.C. office of Gibson, Dunn & Crutcher LLP where for five years he represented international corporate clients on environmental issues including acquisition due diligence, regulatory compliance and litigation. Jim is a 1991 graduate of Southern Methodist University School of Law. Prior to law school, he operated his own company engaged in real estate brokerage, development and property management. Mr. Biederman replaced Victoria Ruttenberg, who retired to spend more time with her children. Mr. Biederman can be reached at 202-501-0255.

## New Fact Sheets From NEPA Call-In

**N**EPA Call-In has completed new fact sheets on NEPA and related issues. *The National Environmental Policy Act* and *National Historic Preservation Act Section 106 Review* are four page fact sheets summarizing each law's requirements and procedures. The fact sheets provide a brief overview of the laws and are intended for building managers and others unfamiliar with NEPA and the NHPA.

Also complete is the fact sheet *Environmental Site Assessments*. The fact sheet discusses the purpose of ESAs, the legal basis for conducting such studies, GSA guidance, and American Society for Testing and Materials (ASTM) standards for the conduct of ESAs.

NEPA Call-In is also finalizing the fact sheet *Floods and Flood Hazards* and a companion fact sheet *When*

*Siting in a Floodplain is the Only Practicable Alternative*. The second fact sheet details the requirements necessary to comply with Executive Order 11988, "Floodplain Management." A third future fact sheet will cover Public Involvement Requirements of NEPA.

New and previously published fact sheets are available from NEPA Call-In at 202-208-6228.



## Interesting Technical Inquiries (TIs)

### TI 0078 —

#### Public Notification for FONSI

NEPA Call-In recently provided information on the requirements for GSA to make public Findings of No Significant Impact (FONSIs) resulting from an Environmental Assessment (EA). A customer wanted to know whether there was a Federal or GSA requirement for public notification or a public comment period for the publication of a FONSI.

**Summary of Findings:** NEPA Call-In found a FONSI must be made publicly available. A public notification of availability must be made prior to the implementation of an action. NEPA Call-In determined there are no regulations stating the time requirement for public review of a FONSI prior to implementing an action unless the action (1) is of the type which normally requires an EIS, (2) is an action for which similar actions have required an EIS, or (3) is an action without precedent. These actions require a 30-day public notification process. For FONSIs which do not fall into one of the above categories, the length of time for public notification prior to beginning an action should be determined by the appropriate agency administrator. NEPA Call-In's detailed findings are provided below.

**Detailed Findings:** NEPA Call-In reviewed Title 40 CFR Part 1501, "NEPA and Agency Planning." Section 1501.4(e)(1), "Whether to prepare an environmental impact statement," states, "the agency shall make the finding of no significant impact available to the affected public as specified in Part 1506.6." NEPA Call-In reviewed Title 40 CFR Part 1506.6, "Public Involvement." This section states Agencies shall "(b) Provide public notice of NEPA-related hearings, public meetings, and the availability of environmental documents so as to inform those persons and agencies who may be interested or affected." Title 40 CFR 1506.6 gives a general overview of the requirement for public review of EAs and FONSIs but does not specify a time requirement.

GSA's specific requirements are outlined in PBS P 1095.4B, "PBS Preparation of Environmental Assessments and Environ-

mental Impact Statements." PBS P 1095.4B, Chapter 6, "Public information and involvement," paragraph 3, "Reviewing the finding of no significant impact (FONSI)," states "if the EA results in a FONSI, give public notice of the fact (under 40 CFR Part 1501.4(e)(1) and (2)) and make the FONSI available in the regional office for public review and comment before starting the action." Chapter 6, Paragraph 17, "Other public notice," states the FONSI and EA must be made publicly available for 30 days before taking action if the proposed action is one that (1) normally would require an EIS as set out in Chapters 2-3 of PBS P 1095.4B, (2) is similar to actions for which several statements have been prepared, or (3) has been announced as the subject of a statement. If any of these three conditions apply to the proposed action, then the 30-day public notification period is required.

Finally, NEPA Call-In reviewed a CEQ document titled "Forty Most Frequently Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," published in the Federal Register, March 23, 1981. Question 38, "Must EAs and FONSIs be made public? If so, how should this be done?" addresses the topic of public availability of EAs and FONSIs. The answer from CEQ references Title 40 CFR Part 1506.6(b). It also states local newspaper notices may be more appropriate for regional or site-specific proposals. The document makes no reference to a time requirement for the notification process. However, the objective of the public notification process "is to notify all interested or affected parties. If this is not being achieved, then the methods should be reevaluated and changed. Repeated failure to reach the interested or affected public would be interpreted as a violation of the regulations."

NEPA Call-In provided the customer with the above mentioned documents; which can be obtained by contacting NEPA Call-In.



## Interesting TIs (con'd)

### TI 0065 — GSA Compliance With SIPs

NEPA Call-In recently received a request for information if GSA is required to comply with Clean Air Act (CAA) State Implementation Plans (SIPs).

NEPA Call-In found the GSA must comply with SIPs. NEPA Call-In found Section 176 of the CAA, "Limitations on Certain Federal Assistance," prohibits any Federal department, agency, or instrumentality of the Federal Government from engaging in any activity which does not conform to an approved or promulgated implementation plan developed under Section 110, "Implementation Plans" of the CAA. Further, CAA, Section 118, "Control of Pollution from Federal Facilities," requires all Federal agencies to comply with all Federal, state, interstate, and local requirements in the same manner and to the same extent as any non-governmental entity.

Although the CAA is a Federal law applicable nationwide, the primary responsibility for implementing and enforcing its provisions rests with the States. Under the law, the Environmental Protection Agency (EPA) establishes minimum requirements for achieving acceptable air quality. Actual implementation of the program, however, lies with the states. To implement the CAA, each state must develop a SIP which is a collection of the regulations a state will use to clean up polluted areas. Because each is tailored for a particular state, SIPs will differ from state to state, and in some cases, from region to region. In many cases, the regulations developed by the state will be more stringent than the corresponding Federal ones. Under no circumstances, however, can SIPs have weaker pollution controls than those established by the EPA. Each plan must be approved by the EPA before it may be implemented.

NEPA Call-In provided the information mentioned above to the client. This information will also be incorporated into GSA's NEPA Desk Guide.

### TI 0085 — Format of and Public Notice for ROD

A customer recently requested information on the requirements for a public Notice of Availability (NOA) of a Record of Decision (ROD) after an Environmental Impact Statement (EIS). The customer wanted to know if the actual ROD document needed to be published or just a notice of its availability, and requested guidance on the format for a NOA for a ROD.

*Summary of Findings:* NEPA Call-In found only a NOA for a ROD needs to be published, and not the actual ROD document. Once the availability of a ROD is published, no public comment period is necessary prior to beginning the action. NEPA Call-In's detailed findings are provided below.

*Detailed Findings:* NEPA Call-In reviewed the CEQ regulations in Title 40 Code of Federal Regulations (CFR) part 1505.2, "Record of decision in cases requiring environmental impact statements." Sections (a), (b), and (c) provide the following guidance for the content of the ROD. The ROD must: (1) state what the decision was, (2) identify all alternatives considered by the agency and discuss all factors influencing the decision, (3) state whether all practicable means to avoid or minimize adverse environmental impacts were adopted and, if not, why, and (4) be accompanied by the Final or Supplemental EIS.

NEPA Call-In reviewed the CEQ document titled "40 Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" printed in the Federal Register, March 23, 1981. Questions 34 (a-d) addresses the most frequently asked questions pertaining to RODs. Question 34 (a) explains how the ROD should be made available to the public. Question 34 (b) explains that the summary section of the final EIS may not substitute for or constitute the agency's ROD. Question 34 (c) explains what provisions RODs should contain pertaining to mitigation and monitoring, and question 34 (d) addresses the enforceability of a ROD.

NEPA Call-In also reviewed PBS P 1095.4B, "PBS Preparation of environmental assessments and environmental impact statements." PBS P 1095.4B, Chapter six, "Public information and involvement," Part two, "Other public involvement" restates the above CEQ regulations as GSA guidance. In addition, it states that a notice of availability for the ROD must be made

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*Interesting TIs, continued from page 7*

available in the following ways: (1) The notice of availability should be sent to persons and groups requesting it; (2) the notice of availability should be published in the Federal Register for actions of national concern; and (3) the notice of availability should be published in local newspapers, newsletters, State clearinghouses, local media, etc. for actions of primarily local concern. PBS P 1095.4B also states additional public notices beyond those specified above may be made at the discretion of the regions. Finally, the document states the ROD must be accompanied by a copy of the Final EIS.

NEPA Call-In then reviewed Chapter 7.15, "Record of Decision" of the final working draft of the PBS NEPA Desk Guide, dated May 16, 1997. This document also restates the CEQ regulations found in Title 40 CFR Part 1505.2. The draft Desk Guide suggests summarizing the contents of the EIS in the ROD. Finally, NEPA Call-In reviewed Exhibit 7-4, "Format for Notice of Availability of EIS," of the NEPA Desk Guide. Because these EISs and RODs are required to be made publicly available in the same way, Exhibit 7-4 may also be used for a ROD. A sample ROD as well as the above mentioned documents were provided to the customer. This information can be obtained by contacting NEPA Call-In.

*NEPA Call-In is designed to meet the NEPA  
compliance needs of GSA's realty professionals.*



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## GSA OFFICE OF THE ENVIRONMENTAL EXECUTIVE

Regional Environmental Coordinators responsible for implementing waste prevention and recycling and reporting accomplishments to the National Office

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